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18 UNITED STATES DISTRICT COURT
19 SOUTHERN DISTRICT OF CALIFORNIA

20 IN RE: MIDLAND CREDIT
MANAGEMENT, INC.,
21 TELEPHONE CONSUMER
22 PROTECTION ACT LITIGATION.

Case No. 11-md-2286 MMA (MDD)

Member Cases: 10-cv-02261
10-cv-02600
10-cv-02368
10-cv-02370

**JOINT MOTION TO CONTINUE
EXPERT DISCLOSURE,
DISCOVERY AND CLASS
CERTIFICATION DEADLINES**

1 Following the telephonic status conference held on June 24, 2014 with
2 United States Magistrate Judge Mitchell D. Dembin, the parties file this Joint
3 Motion to Continue Expert Disclosure, Discovery and Class Certification
4 Deadlines. The parties continue to work to reduce the terms of their settlement to
5 writing, have exchanged several drafts of the settlement Memorandum of
6 Understanding, and are scheduled to meet with the mediator Judge Herbert
7 Hoffman (Ret.) on July 10, 2014.

8 The Court's Order Amending Case Management Order issued April 25, 2014
9 (Doc. No. 88), sets the deadline for expert disclosures required by Fed. R. Civ. P.
10 26(a)(2) as June 18, 2014, the deadline for contradictory or rebuttal disclosures
11 within the meaning of Rule 26(a)(2)(D)(ii) as July 9, 2014, the deadline for
12 completion of fact and expert discovery as August 13, 2014, and the deadline for
13 Plaintiffs to file a motion for class certification of September 11, 2014.

14 Given that reducing the settlement to writing is taking longer than expected,
15 the parties request that these deadlines be extended to the following:

16 1. All expert disclosures required by Fed.R.Civ.P. 26(a)(2) shall be
17 served on all parties on or before August 1, 2014.

18 2. Any contradictory or rebuttal disclosures within the meaning of Rule
19 26(a)(2)(D)(ii) shall be served on all parties on or before August 22, 2014.

20 3. All fact and expert discovery necessary to support or oppose class
21 certification shall be completed by September 30, 2014.

22 4. On or before October 27, 2014, any motion for class certification shall
23 be filed.

1 Dated: June 25, 2014

2 By s/ Edward D. Totino
3 WILLIAM S. BOGGS
4 EDWARD D. TOTINO
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15 Dated: June 25, 2014

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17 CAMPION, APC

18 By s/ Douglas J. Campion
19 DOUGLAS J. CAMPION

20 Dated: June 25, 2014

21 EDELMAN, COMBS, LATTURNER &
22 GOODWIN, LLC

23 By s/ James O. Latturner
24 JAMES O. LATTURNER

25 Co-Lead Counsel for Plaintiffs
26
27
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CERTIFICATE OF SERVICE

I am a resident of the State of California, over the age of eighteen years, and not a party to the within action. My business address is 2000 Avenue of the Stars, Suite 400 North Tower, Los Angeles, California, 90067. On June 26, 2014, I served the within document(s):

JOINT MOTION TO CONTINUE EXPERT DISCLOSURE, DISCOVERY AND CLASS CERTIFICATION DEADLINES

- ☐ by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m.
- ☐ by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, for delivery via overnight/express service carrier at San Diego, California addressed as set forth below.
- ☐ by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at San Diego, California addressed as set forth below.
- ☐ by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below on this date before the close of normal business hours.
- ☐ by transmitting via electronic mail a copy of the document(s) listed above in .pdf format, with no transmission errors reported, to the person(s) at the e-mail address(es) denoted on the Electronic Mail notice list.
- ☒ I hereby certify that on the below date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Electronic Mail notice list.

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing affidavit.

I declare that I am employed in the office of a member of the Bar of or permitted to practice before this Court at whose direction the service was made.

Executed on June 26, 2014, at Los Angeles, California.



Ann Lozinski